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Case Summary

Case Number: HUD L-002632-20**Case Caption:** Bradley Radiah Vs Jersey City Public S Chools**Court:** Civil Part**Venue:** Hudson**Case Initiation Date:** 07/21/2020**Case Type:** Law Against Discrimination (Lad) Cases**Case Status:** Active**Jury Demand:** 6 Jurors**Case Track:** 3**Judge:** Joseph V Isabella**Team:** 1**Original Discovery End Date:****Current Discovery End Date:****# of DED Extensions:** 0**Original Arbitration Date:****Current Arbitration Date:****# of Arb Adjournments:** 0**Original Trial Date:****Current Trial Date:****# of Trial Date Adjournments:** 0**Disposition Date:****Case Disposition:** Open**Statewide Lien:****Plaintiffs****Radiah Bradley****Party Description:** Individual**Attorney Name:** Ty Hyderally**Address Line 1:****Address Line 2:****Attorney Bar ID:** 023231993**City:****State:** NJ**Zip:** 00000**Phone:****Attorney Email:** TYH@EMPLOYMENTLIT.COM**Defendants****John Does 1-10****Party Description:** Fictitious**Attorney Name:****Address Line 1:****Address Line 2:****Attorney Bar ID:****City:****State:** NJ**Zip:** 00000**Phone:****Attorney Email:****Jersey City Public Schools****Party Description:** Municipality**Attorney Name:****Address Line 1:****Address Line 2:****Attorney Bar ID:****City:****State:** NJ**Zip:** 00000**Phone:****Attorney Email:****XYZ Corp.1-10****Party Description:** Fictitious**Attorney Name:****Address Line 1:****Address Line 2:****Attorney Bar ID:****City:****State:** NJ**Zip:** 00000**Phone:****Attorney Email:****Case Actions**

Filed Date	Docket Text	Transaction ID	Entry Date
07/21/2020	Complaint with Jury Demand for HUD-L-002632-20 submitted by HYDERALLY, TY, HYDERALLY & ASSOCIATES, P.C. on behalf of RADIAH BRADLEY against JERSEY CITY PUBLIC SCHOOLS, JOHN DOES 1-10, XYZ CORP.1-10	LCV20201265487	07/21/2020
07/22/2020	TRACK ASSIGNMENT Notice submitted by Case Management	LCV20201266783	07/22/2020
08/06/2020	CORRECTED: AFFIDAVIT OF SERVICE submitted by HYDERALLY, TY of HYDERALLY & ASSOCIATES, P.C. on behalf of RADIAH BRADLEY against JOHN DOES 1-10, JERSEY CITY PUBLIC SCHOOLS, XYZ CORP.1-10	LCV20201361341	08/06/2020
08/06/2020	CORRECTION: re: [LCV20201361341] AFFIDAVIT OF SERVICE submitted by HYDERALLY, TY of HYDERALLY & ASSOCIATES, P.C. on behalf of RADIAH BRADLEY against JOHN DOES 1-10, JERSEY CITY PUBLIC SCHOOLS, XYZ CORP.1-10 Filing Type has been changed to PROOF OF SERVICE by Case Management Staff	LCV20201361822	08/06/2020

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Attorneys for Plaintiff: Radiah Bradley

RADIAH BRADLEY,

PLAINTIFF,

VS.

**JERSEY CITY PUBLIC SCHOOLS.,
JOHN DOES 1-10, AND XYZ CORP.
1-10,**

DEFENDANTS.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: HUDSON COUNTY
DOCKET NO.:

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, Radiah Bradley (“Bradley” or “Plaintiff”), who resides at 34 North 17th Street, East Orange, New Jersey 07017, by way of this Complaint against Defendants, Jersey City Public Schools (“JCPS” or “Defendant”), John Does 1-10, and XYZ Corp. 1-10 (hereinafter collectively “Defendants”) hereby says:

I. Nature of Action, Jurisdiction, and Venue

1. This is an action seeking equitable and legal relief for: (1) a violation of the Family and Medical Leave Act, 29 U.S.C. § 2601 *et seq.* (Retaliation); (2) a violation of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 *et seq.* (“LAD”) (Disability Discrimination, Perceived); and (3) a violation of the LAD (Retaliation).
2. This court has jurisdiction due to the nature of the action and the amount in controversy. Additionally, Plaintiff has satisfied all prerequisites to bringing these claims.
3. Venue is appropriate in this court since Plaintiff worked in Hudson County and Defendants do business in Hudson County.

II. Parties

4. Bradley was a Clerk 3 for JCPS, located at 346 Claremont Avenue, Jersey City, New Jersey, 07305.
5. Bradley was an employee of the Defendant and performed job related duties in the State of New Jersey.
6. During the relevant time period, JOHN DOES 1-10 are currently unknown employees who were either senior management level employees who controlled Plaintiff's workplace, and supervised Plaintiff and aided and/or abetted in the commission of conduct complained of herein and/or who either acted within the scope of their employment at the workplace during working hours, or, to the extent they went beyond the scope of their employment, defendants ratified, embraced and added to his conduct. As the parties engage in discovery, Plaintiff retains the right to amend the Complaint to add these individual employees by name.
7. During the relevant time period, XYZ Corp. 1-10 are unknown affiliated corporations or entities or other corporations who have liability for the claims set forth herein. As the parties engage in discovery, Plaintiff retains the right to amend the Complaint to add these individual entities by name.
8. Thus, all defendants are subject to suit under the statutes cited.
9. At all times referred to in this Complaint, employees of the Corporate Defendants, who are referred to herein, were acting within the scope of their employment at the workplace during working hours, or, to the extent that they were not so acting, the Corporate Defendant ratified, embraced and added to their conduct.

III. Factual Allegations

10. On or about October 22, 2002, Bradley started working as a Clerk for the Defendant in the Special Education Department.
11. In 2012, Bradley was promoted to Senior Clerk assigned to Julia A. Barnes School/PS12.

12. In 2014, Bradley was promoted to Clerk 3 at an annual salary of approximately \$62,000 and was assigned to the Maintenance Department, under the supervision of Kevin O'Reilly ("O'Reilly").
13. On or about September 2019, Thomas Curtis became Director of Maintenance ("Curtis") and Bradley's supervisor.
14. Bradley's duties included handling billing for vendors, doing payroll approximately twice a month for per diem custodial workers, and closing work orders for repairs in all JCPS-owned buildings.
15. Bradley worked Monday to Friday from 9:00 AM to 4:30 PM with a half-hour lunch, for a total of 35 hours a week.
16. In December 2019, Bradley experienced health issues that required time off from work, for which she obtained permission from JCPS and used her accrued paid time off (PTO).
17. Bradley used PTO from December 23, 2019 until the end of 2019 to attend to her health issues.
18. Bradley was unable to return to work on January 2, 2019, as scheduled, and advised Curtis as well as Florence Brajczewski, Management Assistant for the Facilities Department ("Brajczewski"), of her need for additional time off due to her health condition.
19. On or around January 6, 2020, Bradley advised Brajczewski over the phone that Bradley was scheduled for surgery related to stomach problems on January 13, 2020.
20. Bradley followed JCPS policies and procedures and requested a medical leave of absence ("LOA") for surgery and recovery thereof. (Exhibit "1").
21. Bradley's physician, Hans Schmidt, M.D. ("Dr. Schmidt"), of Advanced Laparoscopic Associates in Paramus, New Jersey, certified Bradley's period of temporary disability from January 2, 2020 through February 10, 2020.
22. Bradley experienced post-surgical complications which required Dr. Schmidt to extend Bradley's disability leave to March 23, 2020. (Exhibit "2").
23. Bradley provided medical documentation to JCPS which included a Disability Certificate from Dr. Schmidt with a return to work date of March 23, 2020. (Exhibit "3").
24. The Jersey City Board of Education approved the extension of Bradley's LOA by resolution adopted on February 27, 2020. (Exhibit "4").

25. Bradley was removed from payroll and was paid during her LOA by her disability insurance carrier, Colonial Insurance Company (“Colonial”).
26. Bradley returned to work on March 24, 2020, advising Curtis, Brajczewski and Regina Robinson, School Business Administrator /Board Secretary (“Robinson”), that she had signed into the attendance portal, after which Robinson added Edwin Rivera, Acting Director of Human Resources (“Rivera”) to the email thread. (Exhibit “5”).
27. Bradley asked Brajczewski for her work assignment, to which Brajczewski responded that there was nothing for Bradley to do, but that employees logged in to let JCPS know that they are available. (Exhibit “6”).
28. In addition, Bradley emailed Cristina Kliatchko, Supervisor of Payroll (“Kliatchko”), advising that she returned to work and asked to be put back on payroll. (Exhibit “7”).
29. Kliatchko responded that the Facilities Department had to forward a return to work form in order for Bradley to be put back on payroll.
30. Bradley promptly informed Brajczewski of Kliatchko’s request and Brajczewski provided the return to work form.
31. It was imperative that Bradley be put on payroll promptly as Colonial had stopped paying Bradley as of March 24, 2020.
32. Bradley also emailed Rivera and Tracey Stone (“Stone”), Personnel Assistant, Medical Department, informing them that she had returned from her leave of absence. (Exhibit “8”).
33. On March 26, 2020, Brajczewski informed Bradley that she would be paid on March 31, 2020, as Brajczewski submitted the Return to Work form to Kliatchko. (Exhibit “9”).
34. On March 27, 2020, Kliatchko informed Bradley that she was overpaid on her last paycheck, prior to her LOA, and that five (5) days of pay would be deducted from Bradley’s paychecks over the next four (4) pay periods.
35. From March 24, 2020 through March 31, 2020, Bradley logged into the attendance portal daily, as per JCPS policy.
36. On March 31, 2020, Bradley saw an email from Curtis, that he had sent subsequent to the end of her work day on March 30, 2020, asking if Bradley was coming to the office on March 31, to do payroll for per diem employees. (Exhibit “10”).
37. Bradley was surprised at being asked to come to the office during the pandemic, when she could perform payroll duties remotely.

38. In addition, Bradley was unable to go to the office, as her young daughter's school was closed, due to the pandemic and she was her daughter's sole caretaker.
39. On March 31, 2020, Bradley responded to Curtis and copied Robinson, Brajczewski and Superintendent Franklin Walker ("Walker"), attaching a March 25, 2020 notice from her child's school district extending the school closure. (Exhibit "11").
40. Bradley explained that she was unable to come to the office because she did not have child care for her young daughter, but noted that she could perform payroll remotely, as payroll is normally done through email.
41. Robinson took issue with Bradley including the Superintendent in her email, saying she was removing him from the email thread "for obvious reasons", to which Bradley responded that she was advised to copy the Superintendent so Bradley would not get into any trouble.
42. Upon information and belief, other employees, such as Tanya Parker ("Parker") and Ashley King ("King"), had also copied the Superintendent on similar emails, saying they could not go to the office, because their children's schools were closed and they did not have childcare.
43. To Robinson's knowledge, none of these employees were criticized for copying the Superintendent.
44. Robinson also instructed Bradley, on March 31, 2020, to, "Connect to HR before cleared to return."
45. This directive made no sense as Bradley had already been cleared to return to work by Dr. Schmidt, and the Maintenance Department had sent her Return to Work form to the Payroll Department.
46. Further, the request was nonsensical, as Bradley had been logging into the attendance portal since March 24, 2020. Further, Defendants were well aware that Bradley had returned to work, due to her prior communications with them.
47. Nevertheless, Bradley complied with Robinson's instructions and emailed Rivera per Robinson's directive.
48. Rivera responded that staff returning from leave or extended periods of time off from work had to be cleared by Human Resources and that her "current status will remain the same until we return to full function as a district".

49. Bradley was taken aback by such response as she had already returned to work from her medical leave, as of March 24, 2020.
50. Bradley asked Rivera if she would get paid as she had been logging into the attendance portal since March 24, 2020.
51. Rivera did not respond to Bradley's email seeking confirmation that she would get paid.
52. The following day, Bradley advised Robinson that she was unable to log into the attendance portal. (Exhibit "12").
53. Robinson merely responded that Rivera would answer Bradley on the matter.
54. Despite Robinson's response, Bradley never heard from Rivera.
55. Thus, Defendants' precluded Bradley from accessing the attendance portal, subsequent to March 31, 2020.
56. Subsequent to March 31, 2020, Bradley has not received any salary from Defendants.
57. Bradley reached out to Kliatchko on April 9, 202 and was told that HR had changed Bradley to not cleared to return to work. (Exhibit "13").
58. Defendants' actions were clearly retaliatory, due to Plaintiff taking a disability leave and a FMLA leave, as Bradley had already been cleared to work and worked from March 24 to March 31, 2020.
59. Bradley took numerous efforts to try to remediate the situation, but to no success. (Exhibits "14-18").
60. On April 27, 2020, Bradley sent an updated disability certificate to Pawlowski, signed by Dr. Schmidt, certifying that Bradley had been cleared to work full duty without restrictions since March 23, 2020. (Exhibit "19").
61. Bradley was thus fully cleared to return to work and needed no medical clearance to return to work.
62. However, due to Defendants' retaliatory animus against Bradley, they refused to allow her to return to work.
63. Further, Defendants then informed Bradley that she needed to meet with the worker's compensation medical center, Concentra.
64. Thus, Defendants perceived Bradley as disabled/suffering from a medical condition that precluded her from returning to work, despite the fact that she was fully cleared to return to work, no restrictions, by a licensed and qualified medical doctor.

65. Bradley asked why she had to go to Concentra and asked to see the JCPS policy related to the issue. No answer was given. No policy was provided.
66. Rather, Defendants maintained their retaliatory and discriminatory action of terminating Bradley as of March 31, 2020.
67. Defendants' termination of Bradley was clearly not based upon any legitimate reasons, but rather, was in retaliation for Bradley taking a medical leave under the FMLA and in discrimination for perceiving Bradley as disabled.
68. Bradley had never been suspended before she was terminated.
69. Bradley had never been demoted before she was terminated.
70. Bradley had never been placed on a Performance Improvement Plan before she was terminated.
71. Bradley had never been threatened with termination before she was terminated.
72. Rather, Bradley performed her work duties in an exemplary fashion and followed Defendants' policies and procedures related to return to work after FMLA/disability leave.
73. Defendants' termination of Bradley caused her to suffer severe emotional and physical harm as well as exceptional emotional distress, anxiety and sleeplessness.
74. At the time of her termination, April 1, 2020, Bradley was paid an annual salary of \$67,000 a year.
75. Bradley's job benefits included medical, dental and vision insurance, vacation, sick leave, holidays and pension.
76. These benefits of employment, and those set forth below, make up Bradley's claim for damages.

Count I
(FMLA Retaliation)

77. Plaintiff realleges and incorporates herein the paragraphs set forth in this Complaint.
78. The foregoing facts and circumstances demonstrate that Defendants have violated the Family Medical Leave Act, 29 U.S.C. § 2601 et seq. (the "FMLA").
79. Defendants are subject to the FMLA and Plaintiff took a FMLA leave.
80. Subsequently, Defendants retaliated against Plaintiff and terminated her in retaliation for Plaintiff having taken FMLA leave.

81. As a direct and proximate result of the actions of Defendants, Plaintiff has suffered mental anguish, physical discomfort, pain and suffering, shame and embarrassment, and/or aggravation of a previously existing mental or emotional and physical condition. Furthermore, Plaintiff has suffered lost wages, a diminished ability to earn a living, and a diminished capacity to enjoy Plaintiff's life. Moreover, Plaintiff has and/or may have to incur expenses for medical, psychiatric, and/or psychological counseling and care.
82. Plaintiff's damages have been experienced in the past, and they will continue into the future.
83. Plaintiff has been required to retain an attorney to assist Plaintiff in asserting Plaintiff's claims and protecting Plaintiff's rights.

Count II
(New Jersey Law Against Discrimination)
(Disability Discrimination; Perceived)

84. Plaintiff realleges and incorporates herein the paragraphs set forth in this Complaint.
85. The foregoing facts and circumstances demonstrate that Defendants have violated the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 *et seq.*, by discriminating against Plaintiff due to perceiving Plaintiff as handicapped and/or disabled.
86. As a direct and proximate result of the actions of Defendants, Plaintiff has suffered mental anguish, physical discomfort, pain and suffering, shame and embarrassment, emotional distress injuries, the physical manifestation of emotional distress injuries and/or physical injury. Furthermore, Plaintiff has suffered lost wages, a diminished ability to earn a living, and a diminished capacity to enjoy Plaintiff's life. Moreover, Plaintiff has and/or may have to incur expenses for medical, psychiatric, and/or psychological counseling and care. Plaintiff's damages have been experienced in the past, and they will continue into the future.
87. Further, Plaintiff has been required to retain an attorney to assist Plaintiff in asserting Plaintiff's claims and protecting Plaintiff's rights.

Count III
(New Jersey Law Against Discrimination)
(Retaliation)

88. Plaintiff realleges and incorporates herein the paragraphs set forth in this Complaint.
89. The foregoing facts and circumstances demonstrate that Defendants have violated the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 et seq., by retaliating against Plaintiff for engaging in the protected activity of taking disability leave and/or medical leave and/or requesting reasonable accommodations due to the medical/disability leave.
90. As a direct and proximate result of the actions of Defendants, Plaintiff has suffered mental anguish, physical discomfort, pain and suffering, shame and embarrassment, emotional distress injuries, the physical manifestation of emotional distress injuries and/or physical injury. Furthermore, Plaintiff has suffered lost wages, a diminished ability to earn a living, and a diminished capacity to enjoy Plaintiff's life. Moreover, Plaintiff has and/or may have to incur expenses for medical, psychiatric, and/or psychological counseling and care. Plaintiff's damages have been experienced in the past, and they will continue into the future.
91. Further, Plaintiff has been required to retain an attorney to assist Plaintiff in asserting Plaintiff's claims and protecting Plaintiff's rights.

WHEREFORE, as to each and every count, Plaintiff demands judgment on each and all of these Counts against the Defendants jointly and severally, as follows:

- A. Compensatory damages of not less than \$200,000;
- B. Damages for lost wages and benefits, back pay, front pay (or reinstatement/rehiring);
- C. Damages for humiliation, mental and emotional distress;
- D. Statutory damages, if applicable;
- E. Punitive damages and or liquidated damages where permitted by law;
- F. Attorneys' fees and costs of suit;
- G. Lawful interest - including pre-judgment interest on lost wages;

- H. Lawful interest - including pre-judgment interest on any wages not paid in a timely manner; and
- I. Such other, further and different relief as the Court deems fitting, just and proper.

Plaintiff hereby reserves the right to amend this Complaint to supplement or modify the factual obligations and claims contained herein, based upon information received from the Defendants, witnesses, experts, and others in the course of discovery in this matter.

DEMAND FOR TRIAL BY JURY

Pursuant to Rule 4:35-1(a) and (b), Plaintiff respectfully demands a trial by jury on all issues in the within action so triable.

DESIGNATION OF TRIAL COUNSEL

In accordance with Rule 4:25-4, TY HYDERALLY is hereby designated as trial counsel on behalf of Plaintiff.

R. 4:5-1(b)(2) CERTIFICATION OF NO OTHER ACTIONS OR PARTIES

I hereby certify that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, that no other action or arbitration proceeding is contemplated, and that there are no other parties known to me at this time who should be joined as parties to this action.

DEMAND FOR PRODUCTION OF INSURANCE AGREEMENTS

Pursuant to R. 4:10-2(b), demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment.

If so, please attach a copy of each, or in the alternative state, under oath and certification: (A) policy number; (b) name and address of insurer; (c) inception and expiration date; (d) names and addresses of all persons insured thereunder; (e) personal injury limits; (f) property damage limits; and (g) medical payment limits.

DATED: July 21, 2020

HYDERALLY & ASSOCIATES, P.C.
Attorneys for Plaintiff

A handwritten signature in black ink, appearing to read 'Ty Hyderally', with a stylized flourish at the end.

By:

TY HYDERALLY, Esq.
For the Firm

T:\Bradley Radiah\Pleadings\072120 COM.docx

Exhibit “1”

Form M101-A

No. of Leaves: 1,2,3

Board of Education - Jersey City, N.J.
APPLICATION FOR LEAVE OF ABSENCE

PERSONAL ILLNESS

1. PRINCIPAL/SUPERVISOR

Name of Applicant: _____ Date: _____
School or Department: _____ Soc. Sec. No. _____
Position: _____
Leave of Absence granted during the last school year and current school year: _____
(Give dates, reasons and duration)

Number of Days absent in current school year _____
Number of Days absent in previous school year (Include Personal Business and Leave time) _____
COMMENT: _____

(Above should pertain to Employees attendance record)

Leave Mailed to: _____ on _____ (Date)
(Name and Address)
Signature: _____
(Principal or Supervisor)

II. APPLICANT: (Fill in Below)

Soc. Sec. No. _____ Date: 1/23/2020
Name (Last) Bradley First Initial G
Address _____ City _____ State _____ Zip Code _____ Phone No. 201-727-3213
Date of Birth: _____ Date of Employment _____ Date Last Worked 12/29/19
1st day of leave 1/23/2020 First Date Physician Consulted 1/23/2020
Last Date Physician Consulted 1/23/2020 Date(s) of Hospitalization _____
Date of Surgery 1/23/2020 Name(s) of Attending Physician(s) Dr. Hans Schmidt

Maternity Leave: YES _____ NO ☒

Reason for Medical Leave: Surgery

I hereby make application for a Medical Leave of Absence during the Period:

From 1/23/2020 to 1/23/2020 to 1/23/2020 19-2020
(Estimate if Necessary)
Applicant's Signature

III. ATTENDING PHYSICIAN (Fill in Below)

I hereby certify that I have examined the above named individual and in my opinion, he/she will be incapacitated for the period of time from 01/23/2020 19 to 02/10/2020 19

The medical diagnosis of this individual's illness is:

E06.01

Sign Name: _____ M.D. _____
Print Name: Dr. Hans Schmidt M.D. Date: 01/29/2020
Address: 81 Route 4 West, Suite 401, Paramus, NY 07652 Telephone: 201-10410-1121

EMPLOYEE MUST RETURN THE APPLICATION TO:

The Medical Director
Jersey City Board of Education
346 Claremont Avenue
Jersey City, NJ 07305

IV. REPORT OF MEDICAL DIRECTOR

Instructional Personnel Medical Leave _____ Non-Instructional Personnel _____
I hereby certify I have reviewed and APPROVE this application
I hereby certify I have reviewed and DO NOT APPROVE this application. (Indicate reason for disapproval below)

Comments: _____

1/23/2020 [Signature] Date _____ Medical Director

Distribution of copies: WHITE-Associate Superintendent's Office, BLUE-School, GREEN-Applicant, YELLOW-Personnel, PINK-Payroll, GOLD-Medical Department

APPLICANT COPY

Exhibit “2”

PRESS HARD

Form M101-A

No of Leaves: 1,2,3

Board of Education - Jersey City, N.J.
APPLICATION FOR LEAVE OF ABSENCE
PERSONAL ILLNESS

I. PRINCIPAL/SUPERVISOR

Name of Applicant: _____ Date _____
School or Department _____ Soc. Sec. No. _____
Position: _____
Instructional _____ Non-Instructional _____
Leave of Absence granted during the last school year and current school year:
(Give dates, reasons and duration) _____

Number of Days absent in current school year _____
Number of Days absent in previous school year (Include Personal Business and Leave time) _____
COMMENT: _____

(Above should pertain to Employees attendance record)

Leave Mailed to: _____ on _____ (Date)
(Name and Address) _____
Signature: _____
(Principal or Supervisor)

II. APPLICANT: (Fill in Below)

Soc. Sec. No. _____ Name (Last) _____ Date: _____
First _____ Initial _____
Address _____ City _____ State _____ Zip Code _____ Phone No. _____
Date of Birth: _____ Date of Employment _____ Date Last Worked _____
1st day of leave _____ First Date Physician Consulted _____
Last Date Physician Consulted _____ Date(s) of Hospitalization _____
Date of Surgery _____ Name(s) of Attending Physician(s) _____

Maternity Leave: YES _____ NO _____
Reason for Medical Leave: _____

I hereby make application for a Medical Leave of Absence during the Period:

From _____ 19 _____ to _____ 19 _____
(Estimate if Necessary)

Applicant's Signature _____

III. ATTENDING PHYSICIAN (Fill in Below)

I hereby certify that I have examined the above named individual and in my opinion, he/she will be incapacitated
for the period of time from 01/09/2020 19 _____ to 03/23/2020 19 _____
The medical diagnosis of this individual's illness is: _____

Sign Name: _____ M.D. _____
Print Name: Dr. Hans Schmidt M.D. Date: 01/09/2020
Address: 21 Rame d'west, suite 401, Paramus, NY, 07652 Telephone: 201-246-1121

EMPLOYEE MUST RETURN THE APPLICATION TO:

The Medical Director
Jersey City Board of Education
346 Claremont Avenue
Jersey City, NJ 07305

IV. REPORT OF MEDICAL DIRECTOR

Instructional Personnel Medical Leave _____ Non-Instructional Personnel _____
I hereby certify I have reviewed and APPROVE this application _____
I hereby certify I have reviewed and DO NOT APPROVE this application. (Indicate reason for disapproval below) _____

Comments: _____

Date _____

Medical Director _____

Distribution of copies: WHITE-Associate Superintendent's Office, BLUE-School, GREEN-Applicant, YELLOW-Personnel,
PINK-Payroll, GOLD-Medical Department

ASSOCIATE SUPERINTENDENT'S OFFICE

Exhibit “3”

DISABILITY CERTIFICATE

ADVANCED LAPAROSCOPIC ASSOCIATES

General and Laparoscopic Surgery

81 E. State Route 4, Suite 401

Paramus, New Jersey 07652

Telephone: (201) 646-1121

Fax: (201) 646-1110

Date 2/12/2020

This is to certify that Radiah Bradley

has been under my professional care and was:

☐ Totally Incapacitated

☐ Partially Incapacitated

from

_____ to _____

Remarks: The patient above had surgery performed on 1/13/2020 and was originally going to return to work this month. However, the patient will need an additional 6 weeks to recover, making her cleared to go back on 3/23/2020.

Dr. Dr. Hans Schmidt, MD
81 Route 4 West, Suite 401
Paramus, NJ 07652

When sending directly to the employer, federal HIPAA regulations require an authorization signed by the patient. See Form #14536/34536 to the Patient's Employer: Authorization for the Use or Disclosure of Health Information.

(Vers. 1/24/2004)

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Exhibit “4”

Category Personnel
Subject Leaves of Absence - Non-Instructional
Type Action (Consent)

BE IT RESOLVED, the Jersey City Board of Education upon the recommendation of the Superintendent approves and/or ratifies the attached Leaves of Absence - Non-Instructional.

	NAME	POSITION	LOCATION	EFFECTIVE DATE	SALARY	FUNDING SOURCE
	PERSONAL ILLNESS					
PI 1.	*** [REDACTED]	Custodial Worker	LHS	02/03/20 to 03/15/20	\$46,116 + \$300 (L)	11.000.2621
PI 2.	*** [REDACTED]	PT/FSW	Food Service Dept.	01/21/20 to 01/29/20	\$13,200	60.910.310
PI 3.	Radiah Bradley	Clerk 3	Maintenance Dept.	01/02/20 to 03/23/20	\$65,400 + \$1,650 (L)	11.000.262
PI 4.	[REDACTED]	Teacher Aide	PS #22	01/23/20 to 01/24/21	\$43,560 + \$1,000 (L)	11.000.217
PI 5.	*** [REDACTED]	Senior Custodian	PS #23	01/21/20 to 01/31/20	\$55,997 + \$1,000 (L)	20.218.200
PI 6.	[REDACTED]	Teacher Aide	PS #23	03/03/20 to 03/30/20	\$43,560 + \$1,000 (L)	20.218.100
PI 7.	*** [REDACTED]	Cook	Academy I	02/18/20 to 03/01/20	\$42,886 + \$500 (L)	60.910.310
PI 8.	*** [REDACTED]	PT/FSW	Food Service Dept.	01/21/20 to 02/28/20	\$13,200	60.910.310
PI 9.	[REDACTED]	Teacher Aide	Regional Day	01/21/20 to 03/03/20	\$3,560 + \$1,650 (L)	70.214.100
PI 10.	k [REDACTED]	PT/Security	Security Dept.	01/28/20 to 02/17/20	\$15,600	11.000.266
PI 11.	** [REDACTED]	Cafeteria Manager	Food Service Dept.	01/20/20 to 03/01/20	\$46,898 + \$1,200 (L)	60.910.310
PI 12.	*** [REDACTED]	Security Guard	PS #28	03/30/20 to 05/24/20	\$36,833 + \$300 (L)	15.000.266
PI 13.	[REDACTED]	Custodial Worker	PS #5	01/27/20 to 02/22/20	\$47,336 + \$300 (L)	11.000.262
PI 14.	*** [REDACTED]	PT/ Custodial	Maintenance Dept.	01/23/20 to 02/24/20	\$13,320	11.000.262
PI 15.	[REDACTED]	Executive Director/Personnel	Human Resources Dept.	01/31/20 to 03/06/20	\$151,776 + \$4,500 (L)	11.000.251
PI 16.	*** [REDACTED]	Food Service Worker	PS #23	01/22/20 to 03/31/20	\$38,380 + \$1,200 (L)	60.910.310
PI 17.	*** [REDACTED]	PT/FSW	Food Service Dept.	01/27/20 to 02/17/20	\$10,800	60.910.310
PI 18.	*** [REDACTED]	PT/FSW	Food Service Dept.	01/06/20 to 01/17/20	\$13,200	60.910.310
PI 19.	[REDACTED]	Custodial Worker	PS #38	04/21/20 to 04/30/20	\$42,077	11.000.262
PI 20.	[REDACTED]	Custodial Worker	PS #6	02/11/20 to 05/11/20	\$49,651 + \$1,200 (L)	11.000.262
PI 21.	*** [REDACTED]	Community Aide	PS #14	01/23/20 to 02/06/20	\$30,450	15.000.211
PI 22.	[REDACTED]	Purchasing Asst	Purchasing	01/21/20 to	\$66,985 + \$3,650	11.000.251

Exhibit “5”



RADIAH BRADLEY <rbradley2@jcboe.org>

Back from leave

3 messages

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 24, 2020 at 8:22 AM

To: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, REGINA ROBINSON
<reginarobinson@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>

Good morning,

I was due back from leave today. I have signed in to the attendance portal.

--

Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

REGINA ROBINSON <reginarobinson@jcboe.org>

Tue, Mar 24, 2020 at 8:46 AM

To: RADIAH BRADLEY <rbradley2@jcboe.org>, EDWIN RIVERA <erivera@jcboe.org>
Cc: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>

Hi Radiah,

I'm going to loop Edwin Rivera, HR into this communication.

Regina Robinson, SFO, RSBA, QPA
School Business Administrator/Board Secretary
Jersey City Public Schools

Doing What's Best for Our Children

"We cannot solve our problems with the same level of thinking that created them." - Albert Einstein

Sent from my iPhone mobile device; please pardon any typographical errors.

On Mar 24, 2020, at 8:22 AM, RADIAH BRADLEY <rbradley2@jcboe.org> wrote:

[Quoted text hidden]

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 24, 2020 at 9:07 AM

To: REGINA ROBINSON <reginarobinson@jcboe.org>

Cc: EDWIN RIVERA <erivera@jcboe.org>, FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, THOMAS
CURTIS <tcurtis@jcboe.org>

Okay, thank you.

[Quoted text hidden]

Exhibit “6”



RADIAH BRADLEY <rbradley2@jcboe.org>

Back from leave

3 messages

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 24, 2020 at 8:31 AM

To: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>

Good morning Florence,

Is there anything I should be working on from home?

--

Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>

Tue, Mar 24, 2020 at 8:36 AM

To: RADIAH BRADLEY <rbradley2@jcboe.org>

Good Morning,

Welcome back! There is nothing for you to do. As it stands now we log in to let them know that we are available.

Thank you,
Florence

[Quoted text hidden]

--

Florence Brajczewski
Management Assistant/Facilities Department
Jersey City Public Schools
346 Claremont Avenue - Room 710
Jersey City, NJ 07305
201.915.6379 * Fax 201.433.9447
fbrajczewski@jcboe.org

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 24, 2020 at 8:45 AM

To: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>

Ok, thanks.

[Quoted text hidden]

Exhibit “7”



RADIAH BRADLEY <rbradley2@jcboe.org>

Back from leave

5 messages

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 24, 2020 at 8:26 AM

To: CRISTINA KLIATCHKO <ckliatchko@jcboe.org>

Good morning,

I'm suppose to return back from leave today and I have signed into the portal. I'm calling because I need to be turned back on in the system.

--

Radiiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

ckliatchko <ckliatchko@jcboe.org>

Tue, Mar 24, 2020 at 8:45 AM

To: RADIAH BRADLEY <rbradley2@jcboe.org>, Miranda Devincenzo <mdevincenzo@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>, florence brajczewski <fbrajczewski@jcboe.org>

Radiiah,

Please have your department give us your return to work form. We can't activate you without it.

Thank you

Sent from my Verizon, Samsung Galaxy smartphone

Exhibit “8”

RADIAH BRADLEY <rbradley2@jcboe.org>

Back from leave

4 messages

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 24, 2020 at 8:20 AM

To: EDWIN RIVERA <erivera@jcboe.org>, MARY BETH MOLONEY <mmoloney@jcboe.org>, TRACEY STONE <tstone@jcboe.org>

Good morning,

My name is Radiah Bradley and I have been on sick leave. Today I'm suppose to report back. I have signed in to attendance online as of today.

Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

TRACEY STONE <tstone@jcboe.org>

Thu, Mar 26, 2020 at 11:16 AM

To: RADIAH BRADLEY <rbradley2@jcboe.org>

Cc: EDWIN RIVERA <erivera@jcboe.org>, MARY BETH MOLONEY <mmoloney@jcboe.org>

Thank you for letting me know.

Tracey Stone

Personnel Assistant

Medical Department

(201) 915-6362 (Office)

(201) 915-0253 (Fax)

Exhibit “9”



RADIAH BRADLEY <rbradley2@jcboe.org>

Return to work form

3 messages

RADIAH BRADLEY <rbradley2@jcboe.org>

Thu, Mar 26, 2020 at 9:05 AM

To: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>

Good morning Florence,

Do you know the next time I will be paid? I'm not sure so I thought I would reach out to you.

--

Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>

Thu, Mar 26, 2020 at 1:17 PM

To: RADIAH BRADLEY <rbradley2@jcboe.org>

Greetings,

I sent the Return to Work form to Tina yesterday. I would believe you will get a check on March 31.

Thank you,

Florence

[Quoted text hidden]

--

Florence Brajczewski
Management Assistant/Facilities Department
Jersey City Public Schools
346 Claremont Avenue - Room 710
Jersey City, NJ 07305
201.915.6379 * Fax 201.433.9447
fbrajczewski@jcboe.org

RADIAH BRADLEY <rbradley2@jcboe.org>

Thu, Mar 26, 2020 at 1:19 PM

To: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>

Ok, thank you, and stay safe.

[Quoted text hidden]

Exhibit “10”



RADIAH BRADLEY <rbradley2@jcboe.org>

Per Diem Payroll

40 messages

THOMAS CURTIS <tcurtis@jcboe.org>

Mon, Mar 30, 2020 at 4:57 PM

To: RADIAH BRADLEY <rbradley2@jcboe.org>

Cc: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, REGINA ROBINSON <reginarobinson@jcboe.org>

Hello Radiah
 Welcome Back
 Hope all is well
 Tomorrow the Payroll is due for the per diems
 Should we expect you to come into work and process
 Lets us know as soon as possible

Thank You

—
Thomas Curtis
Director of Maintenance
346 Claremont Ave.
Jersey City, NJ 07305
(T) 201.915.6379 (F) 201.433.9447 (C) 201.626.0819
tcurtis@jcboe.org

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 31, 2020 at 8:33 AM

To: THOMAS CURTIS <tcurtis@jcboe.org>

Cc: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, FRANKLIN WALKER <fwalker@jcboe.org>, MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, REGINA ROBINSON <reginarobinson@jcboe.org>

Due to the Covid-19, my child is out of school and I do not have child care. I'm not able to come to central office. However, I can work from home. I have attached a copy of the notice from my daughters school that was sent to all parents. There are 9 per diems that payroll needs to be processed for, I can email DG for the Time management website and process the payroll, payroll is done through email so there won't be a problem.

Exhibit “11”

8:26



Extending School Closure

Inbox



Dr. Deborah Harvest Mar 25
to me



Greetings Team EO,

As a result of the variable nature of the Covid19 pandemic, employees of the East Orange School District will continue to work remotely from home. **All buildings will remain closed** to students and staff, with limited access by essential employees **until further notice**. We will continue to keep you informed as we receive updated information. Our students are engaged in virtual classrooms using a variety of platforms. We have implemented practices to reach out to students that are not actively participating to resolve any connection concerns.

Our Grab and Go sites for all East Orange students are fully operational between 8:30 - 11:30 to provide all students, 18 and under, with free breakfast and lunch - Mondays - Fridays. The sites are Bowser Elementary, Campus High School, Garvin Elementary, Houston Elementary, and Hughes Elementary.

We will continue to keep you informed as we receive updated information.
Stay calm, safe, and healthy.

East Orange School District would like to continue connecting with you via email. If you prefer to be removed from our list, please contact East Orange School District directly. To stop receiving all email messages distributed through our SchoolMessenger service, follow this link and confirm:
[Unsubscribe](#)

SchoolMessenger is a notification service used by the nation's leading school systems to connect with parents, students and staff through voice, SMS text, email, and social media.

[Quoted text hidden]

Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

REGINA ROBINSON <reginarobinson@jcboe.org>

To: RADIAH BRADLEY <rbradley2@jcboe.org>, EDWIN RIVERA <erivera@jcboe.org>

Tue, Mar 31, 2020 at 9:20 AM

Cc: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, MIRANDA DEVINCENZO <MDEVINCENZO@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>

Radiah,

Please connect with HR before cleared to return.

Regina Robinson, SFO, RSBA, QPA
School Business Administrator/Board Secretary
Jersey City Public Schools

Doing What's Best for Our Children

"We cannot solve our problems with the same level of thinking that created them." - Albert Einstein

Sent from my iPhone mobile device; please pardon any typographical errors.

On Mar 30, 2020, at 4:57 PM, THOMAS CURTIS <tcurtis@jcboe.org> wrote:

[Quoted text hidden]

REGINA ROBINSON <reginarobinson@jcboe.org>

Tue, Mar 31, 2020 at 9:25 AM

To: RADIAH BRADLEY <rbradley2@jcboe.org>, EDWIN RIVERA <erivera@jcboe.org>

Cc: THOMAS CURTIS <tcurtis@jcboe.org>, FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>

I removed the Superintendent for obvious reasons, and not sure why the need to copy him on a departmental matter.

What per diems are working and the hours they are working? Mr. Rivera in HR is managing all Per Diems at this time.

Regina Robinson, SFO, RSBA, QPA
School Business Administrator/Board Secretary
Jersey City Public Schools

Doing What's Best for Our Children

"I can do things you cannot, you can do things I cannot; together we can do great things". - Mother Teresa

[Quoted text hidden]

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 31, 2020 at 9:30 AM

To: EDWIN RIVERA <erivera@jcboe.org>

Good morning,

Mr. Rivera, I was instructed to contact the Human Resources department. I work in the maintenance Department. I was asked to come in today to process payroll for 9 people. However, I'm not able to come into the office because I have a 8 year old at home, her school is closed and I don't have child care. I can process the payroll for the 9 employees from home. I did email the department back letting them know my situation regarding child care. I was told to reach out to you. To be cleared before I come back. I'm attaching a copy of the email from my daughters school. My number is (201)727-3233

Thank you,

8:26





Extending School Closure

Inbox



Dr. Deborah Harvest Mar 25



to me ▾

Greetings Team EO,

As a result of the variable nature of the Covid19 pandemic, employees of the East Orange School District will continue to work remotely from home. **All buildings will remain closed** to students and staff, with limited access by essential employees **until further notice**. We will continue to keep you informed as we receive updated information. Our students are engaged in virtual classrooms using a variety of platforms. We have implemented practices to reach out to students that are not actively participating to resolve any connection concerns.

Our Grab and Go sites for all East Orange students are fully operational between 8:30 - 11:30 to provide all students, 18 and under, with free breakfast and lunch - Mondays - Fridays. The sites are Bowser Elementary, Campus High School, Garvin Elementary, Houston Elementary, and Hughes Elementary.

We will continue to keep you informed as we receive

updated information.
Stay calm, safe, and healthy.

East Orange School District would like to continue connecting with you via email. If you prefer to be removed from our list, please contact East Orange School District directly. To stop receiving all email messages distributed through our SchoolMessenger service, follow this link and confirm: [Unsubscribe](#)

SchoolMessenger is a notification service used by the nation's leading school systems to connect with parents, students and staff through voice, SMS text, email, and social media

[Quoted text hidden]

[Quoted text hidden]

RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 31, 2020 at 9:33 AM

To: REGINA ROBINSON <reginarobinson@jcboe.org>

Cc: EDWIN RIVERA <erivera@jcboe.org>, FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>

I included the superintendent because I reached out to higher ups on what I should do regarding not being able to work and I was told to send the letter from my daughter school and I was told to include you and the superintendent so all could be aware, so that I would not get into any trouble. That is why the superintendent was included.

[Quoted text hidden]

MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>

Tue, Mar 31, 2020 at 9:36 AM

To: THOMAS CURTIS <tcurtis@jcboe.org>

Cc: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, REGINA ROBINSON <reginarobinson@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>

Hi

My boyfriend is able to take a 1/2 day from work...I'll be in after 1pm to process the per diems payroll....

[Quoted text hidden]

REGINA ROBINSON <reginarobinson@jcboe.org>

Tue, Mar 31, 2020 at 9:37 AM

To: MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>

Cc: THOMAS CURTIS <tcurtis@jcboe.org>, FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>

Please do not come into the building unless I authorize.

Regina Robinson, SFO, RSBA, QPA
School Business Administrator/Board Secretary
Jersey City Public Schools

Doing What's Best for Our Children

"I can do things you cannot, you can do things I cannot; together we can do great things". ~ Mother Teresa

[Quoted text hidden]

FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>

Tue, Mar 31, 2020 at 9:49 AM

To: REGINA ROBINSON <reginarobinson@jcboe.org>

Cc: MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>, HENRY BEDNARSKI <HBEDNARSKI@jcboe.org>

Good Morning,

All Per Diems should have completed and submitted a time sheet while they have worked. I will contact Henry Bednarski. If the time sheets were submitted, should they go to HR?

Thank you,
Florence

Thank you,
Florence

[Quoted text hidden]

Florence Brajczewski

Management Assistant/Facilities Department

Jersey City Public Schools

346 Claremont Avenue - Room 710

Jersey City, NJ 07305

201.915.6379 * Fax 201.433.9447

fbrajczewski@jcboe.org

HENRY BEDNARSKI <hbednarski@jcboe.org>

Tue, Mar 31, 2020 at 10:00 AM

To: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>

Cc: REGINA ROBINSON <reginarobinson@jcboe.org>, MIRANDA DEVINCENZO <MDEVINCENZO@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>

I already separated the per diem time sheets , they are ready to go let me know who to bring them to.

Sent from my iPhone

On Mar 31, 2020, at 09:49, FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org> wrote:

Good Morning,

All Per Diems should have completed and submitted a time sheet while they have worked. I will contact Henry Bednarski. If the time sheets were submitted, should they go to HR?

Thank you,
Florence

Thank you,
Florence

On Tue, Mar 31, 2020 at 9:37 AM REGINA ROBINSON <reginarobinson@jcboe.org> wrote:

Please do not come into the building unless I authorize.

Regina Robinson, SFO, RSBA, QPA
School Business Administrator/Board Secretary
Jersey City Public Schools

Doing What's Best for Our Children

"I can do things you cannot, you can do things I cannot; together we can do great things". ~ Mother Teresa

On Tue, Mar 31, 2020 at 9:36 AM MIRANDA DEVINCENZO <mdevincenzo@jcboe.org> wrote:

Hi

My boyfriend is able to take a 1/2 day from work...I'll be in after 1pm to process the per diems payroll....

On Tue, Mar 31, 2020, 8:33 AM RADIAH BRADLEY <rbradley2@jcboe.org> wrote:

Due to the Covid-19, my child is out of school and I do not have child care. I'm not able to come to central office. However, I can work from home. I have attached a copy of the notice from my daughters school that was sent to all parents. There are 9 per diems that payroll needs to be processed for, I can email DG for the Time management website and process the payroll, payroll is done through email so there won't be a problem.

<IMG_1430.jpg>

[Quoted text hidden]

[Quoted text hidden]

EDWIN RIVERA <erivera@jcboe.org>
To: RADIAH BRADLEY <rbradley2@jcboe.org>

Tue, Mar 31, 2020 at 10:27 AM

Good Morning Mrs. Bradley,

All staff members returning from leave and or extended periods of time off from work must be cleared by Human Resources. At this time your current status will remain the same until we return to full function as a district.

Please stay safe,

Edwin Rivera

[Quoted text hidden]

--

Mr. Edwin Rivera
Principal Assigned to HR
346 Claremont Ave
201-915-6258

RADIAH BRADLEY <rbradley2@jcboe.org>
To: EDWIN RIVERA <erivera@jcboe.org>

Tue, Mar 31, 2020 at 10:29 AM

Does this mean that I will not be getting paid? I signed in the portal on March 24th

[Quoted text hidden]

RADIAH BRADLEY <rbradley2@jcboe.org>
To: EDWIN RIVERA <erivera@jcboe.org>

Tue, Mar 31, 2020 at 10:32 AM

I'm confused because I was told by Human Resources to report back on March 24th, so I signed into the attendance portal.

[Quoted text hidden]

REGINA ROBINSON <reginarobinson@jcboe.org>
To: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>
Cc: MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>, HENRY BEDNARSKI <HBEDNARSKI@jcboe.org>

Tue, Mar 31, 2020 at 12:04 PM

Clarity, HR is handling the Per Diem roster.

Regina Robinson, SFO, RSBA, QPA
School Business Administrator/Board Secretary
Jersey City Public Schools

Doing What's Best for Our Children

"I can do things you cannot, you can do things I cannot; together we can do great things". ~ Mother Teresa

[Quoted text hidden]

FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>
To: REGINA ROBINSON <reginarobinson@jcboe.org>
Cc: MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>, HENRY BEDNARSKI <HBEDNARSKI@jcboe.org>

Tue, Mar 31, 2020 at 12:49 PM

Good Afternoon,

Henry sent the Per Diem Custodial Worker timesheets, for those that have worked, to Edwin Rivera. In order to be paid, the timesheets should have the hours/locations they have work from March 16 - 31, 2020.

Thank you,
Florence

[Quoted text hidden]

FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org> Tue, Mar 31, 2020 at 1:03 PM
To: REGINA ROBINSON <reginarobinson@jcboe.org>
Cc: MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>, HENRY BEDNARSKI <HBEDNARSKI@jcboe.org>

Good Afternoon,

I believe there might be a misunderstanding with Per Diems. The Maintenance Department has been handling/assigning the Per Diem Custodial staff. I believe Edwin Rivera is handling the only Per Diem Clerks.

Thank you,
Florence

[Quoted text hidden]

FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org> Tue, Mar 31, 2020 at 1:04 PM
To: REGINA ROBINSON <reginarobinson@jcboe.org>
Cc: MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>, HENRY BEDNARSKI <HBEDNARSKI@jcboe.org>

Good Afternoon,

I believe there might be a misunderstanding with Per Diems. The Maintenance Department has been handling/assigning the Per Diem Custodial staff. I believe Edwin Rivera is handling only the Per Diem Clerks.

Thank you,
Florence

[Quoted text hidden]

REGINA ROBINSON <reginarobinson@jcboe.org> Tue, Mar 31, 2020 at 1:33 PM
To: FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, EDWIN RIVERA <erivera@jcboe.org>
Cc: MIRANDA DEVINCENZO <mdevincenzo@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>, HENRY BEDNARSKI <HBEDNARSKI@jcboe.org>

+ Edwin,

Let's make sure we are all the same page. Confirm you are managing the per diem worker pool during this time? And, you will all handle the payroll/timesheet processing?

Thanks,

Regina Robinson, SFO, RSBA, QPA
School Business Administrator/Board Secretary
Jersey City Public Schools

Doing What's Best for Our Children

"I can do things you cannot, you can do things I cannot; together we can do great things". ~ Mother Teresa

[Quoted text hidden]

RADIAH BRADLEY <rbradley2@jcboe.org> Thu, Apr 2, 2020 at 10:26 AM
To: "Irsjones123@gmail.com" <Irsjones123@gmail.com>

----- Forwarded message -----

From: **REGINA ROBINSON** <reginarobinson@jcboe.org>
Date: Tue, Mar 31, 2020 at 1:33 PM
Subject: Re: Per Diem Payroll

[Quoted text hidden]

Exhibit “12”



RADIAH BRADLEY <rbradley2@jcboe.org>

Attendance

4 messages

RADIAH BRADLEY <rbradley2@jcboe.org>

Wed, Apr 1, 2020 at 7:35 AM

To: EDWIN RIVERA <erivera@jcboe.org>, FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, REGINA ROBINSON <reginarobinson@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>
Bcc: BEVERLEY SENIOR <bsenior@jcboe.org>

Good morning,

As of this morning, I was not able to sign into the attendance portal. I have been able to sign in since March 24, 2020.

Please advise

--

Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

REGINA ROBINSON <reginarobinson@jcboe.org>

Wed, Apr 1, 2020 at 7:45 AM

To: RADIAH BRADLEY <rbradley2@jcboe.org>

Cc: EDWIN RIVERA <erivera@jcboe.org>, FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>

Hi Radiah,

Edwin Rivera will respond.

Thanks,

Regina Robinson, SFO, RSBA, QPA
School Business Administrator/Board Secretary
Jersey City Public Schools

Doing What's Best for Our Children

"We cannot solve our problems with the same level of thinking that created them." - Albert Einstein

Sent from my iPhone mobile device; please pardon any typographical errors.

On Apr 1, 2020, at 7:35 AM, RADIAH BRADLEY <rbradley2@jcboe.org> wrote:

[Quoted text hidden]

RADIAH BRADLEY <rbradley2@jcboe.org>

Wed, Apr 1, 2020 at 8:15 AM

To: REGINA ROBINSON <reginarobinson@jcboe.org>

Cc: EDWIN RIVERA <erivera@jcboe.org>, FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org>, THOMAS CURTIS <tcurtis@jcboe.org>

Ok, thanks.

[Quoted text hidden]

RADIAH BRADLEY <rbradley2@jcboe.org>

Thu, Apr 2, 2020 at 10:25 AM

To: "lrsjones123@gmail.com" <lrsjones123@gmail.com>

[Quoted text hidden]

Exhibit “13”



RADIAH BRADLEY <rbradley2@jcboe.org>

Payroll- 2nd email

3 messages

RADIAH BRADLEY <rbradley2@jcboe.org>
To: CRISTINA KLIATCHKO <ckliatchko@jcboe.org>

Thu, Apr 9, 2020 at 7:58 AM

Good morning,

Tina can you please let me know if you have received anything clearing me to be paid. I was not paid today. This is my second email can you please let me know.

Thank you

--

Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

ckliatchko <ckliatchko@jcboe.org>
To: RADIAH BRADLEY <rbradley2@jcboe.org>

Thu, Apr 9, 2020 at 8:27 AM

Radiah,

Did you contact Beverly Senior, she sent me an email and I responded to that email.

I received an email from H/R Dept. on employees not cleared to return to work and you're on that list. Please email Mr. Edwin Rivera, payroll dept just follow instructions.

Sorry for the inconvenience.

Thank you and be safe

Exhibit “14”



RADIAH BRADLEY <rbradley2@jcboe.org>

URGENT

4 messages

BEVERLEY SENIOR <bseior@jcboe.org>

Mon, Apr 6, 2020 at 3:06 PM

To: EDWIN RIVERA <erivera@jcboe.org>

Cc: RADIAH BRADLEY <rbradley2@jcboe.org>, John Dillon <DillonJ@njea.org>

Good afternoon Mr. Rivera,

I recently received confirmation from Denise Pawlowski stating to the best of her knowledge Radiah Bradley has returned to work. I am requesting you please send Ms. Cristina Kliatchko, Supervisor of Payroll the required notification from HR clearing Ms. Bradley to return to work as of March 24th per her leave documents so that her compensation will be included in tomorrow's payroll run to be issued on April 9, 2020.

Thank you in advance for your assistance and prompt attention to this matter. If there is anything that I can do to assist please let me know.

Be well, best regards and take care,

Beverley

BEVERLEY SENIOR <bseior@jcboe.org>

Tue, Apr 7, 2020 at 12:24 PM

To: RADIAH BRADLEY <rbradley2@jcboe.org>

Sorry Radiah,

I'm having a rough day. I forgot to copy you on this...again.

Hopefully Ms. Robinson will reply quickly. If she can't assist. I will reach out to Dr. Fernandez and Mr. Walker on your behalf. Is that alright with you?

Beverley

----- Forwarded message -----

From: **BEVERLEY SENIOR** <bseior@jcboe.org>

Date: Tue, Apr 7, 2020 at 12:21 PM

Subject: Fwd: URGENT

To: REGINA ROBINSON <reginarobinson@jcboe.org>

Good afternoon Ms. Robinson,

I hope this correspondence reaches you well. I'm forwarding this hopefully following the chain of command to see if you may be able to assist. Mr. Rivera may be inundated as he has been non-responsive to our many requests regarding Ms. Bradley. If you are unable to assist kindly let me know so that I may do my best and proceed accordingly to assist Ms. Bradley. Unfortunately, we are short on time and I may need to solicit the assistance of Dr. Fernandez or Mr. Walker in order to resolve. It appears to be an easy resolution of HR formally informing our Payroll Dept. that she is cleared. Our next payroll run would not be until the first of May and for Ms. Bradley's family to go without for that period of time should not be acceptable.

Thank you for any assistance you can provide and best regards,

Beverley

----- Forwarded message -----

From: **BEVERLEY SENIOR** <bsenior@jcboe.org>

Date: Mon, Apr 6, 2020 at 3:06 PM

Subject: URGENT

To: EDWIN RIVERA <erivera@jcboe.org>

Cc: RADIAH BRADLEY <rbradley2@jcboe.org>, John Dillon <DillonJ@njea.org>

Good afternoon Mr. Rivera,

I recently received confirmation from Denise Pawlowski stating to the best of her knowledge Radiah Bradley has returned to work. I am requesting you please send Ms. Cristina Kliatchko, Supervisor of Payroll the required notification from HR clearing Ms. Bradley to return to work as of March 24th per her leave documents so that her compensation will be included in tomorrow's payroll run to be issued on April 9, 2020.

Thank you in advance for your assistance and prompt attention to this matter. If there is anything that I can do to assist please let me know.

Be well, best regards and take care,

Beverley

RADIAH BRADLEY <rbradley2@jcboe.org>
To: **BEVERLEY SENIOR** <bsenior@jcboe.org>

Tue, Apr 7, 2020 at 12:39 PM

Thank you Beverly,

I appreciate your help.

On Tue, Apr 7, 2020 at 12:24 PM **BEVERLEY SENIOR** <bsenior@jcboe.org> wrote:

Sorry Radiah,

I'm having a rough day. I forgot to copy you on this...again.

Hopefully Ms. Robinson will reply quickly. If she can't assist. I will reach out to Dr. Fernandez and Mr. Walker on your behalf. Is that alright with you?

Beverley

----- Forwarded message -----

From: **BEVERLEY SENIOR** <bsenior@jcboe.org>

Date: Tue, Apr 7, 2020 at 12:21 PM

Subject: Fwd: URGENT

To: REGINA ROBINSON <reginarobinson@jcboe.org>

Good afternoon Ms. Robinson,

I hope this correspondence reaches you well. I'm forwarding this hopefully following the chain of command to see if you may be able to assist. Mr. Rivera may be inundated as he has been non-responsive to our many requests regarding Ms. Bradley. If you are unable to assist kindly let me know so that I may do my best and proceed accordingly to assist Ms. Bradley. Unfortunately, we are short on time and I may need to solicit the assistance of Dr. Fernandez or Mr. Walker in order to resolve. It appears to be an easy resolution of HR formally informing our Payroll Dept. that she is cleared. Our next

payroll run would not be until the first of May and for Ms. Bradley's family to go without for that period of time should not be acceptable.

Thank you for any assistance you can provide and best regards,

Beverley

----- Forwarded message -----

From: **BEVERLEY SENIOR** <bsenior@jcboe.org>

Date: Mon, Apr 6, 2020 at 3:06 PM

Subject: URGENT

To: EDWIN RIVERA <erivera@jcboe.org>

Cc: RADIAH BRADLEY <rbradley2@jcboe.org>, John Dillon <DillonJ@njea.org>

Good afternoon Mr. Rivera,

I recently received confirmation from Denise Pawlowski stating to the best of her knowledge Radiah Bradley has returned to work. I am requesting you please send Ms. Cristina Kliatchko, Supervisor of Payroll the required notification from HR clearing Ms. Bradley to return to work as of March 24th per her leave documents so that her compensation will be included in tomorrow's payroll run to be issued on April 9, 2020.

Thank you in advance for your assistance and prompt attention to this matter. If there is anything that I can do to assist please let me know.

Be well, best regards and take care,

Beverley

--
Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

RADIAH BRADLEY <rbradley2@jcboe.org>
To: BEVERLEY SENIOR <bsenior@jcboe.org>

Tue, Apr 7, 2020 at 12:41 PM

That's ok with me

On Tue, Apr 7, 2020 at 12:24 PM BEVERLEY SENIOR <bsenior@jcboe.org> wrote:

Sorry Radiah,

I'm having a rough day. I forgot to copy you on this...again.
Hopefully Ms. Robinson will reply quickly. If she can't assist. I will reach out to Dr. Fernandez and Mr. Walker on your behalf. Is that alright with you?

Beverley

----- Forwarded message -----

From: **BEVERLEY SENIOR** <bsenior@jcboe.org>

Date: Tue, Apr 7, 2020 at 12:21 PM

Subject: Fwd: URGENT

To: REGINA ROBINSON <reginarobinson@jcboe.org>

Good afternoon Ms. Robinson,

I hope this correspondence reaches you well. I'm forwarding this hopefully following the chain of command to see if you may be able to assist. Mr. Rivera may be inundated as he has been non-responsive to our many requests regarding Ms. Bradley. If you are unable to assist kindly let me know so that I may do my best and proceed accordingly to assist Ms. Bradley. Unfortunately, we are short on time and I may need to solicit the assistance of Dr. Fernandez or Mr. Walker in order to resolve. It appears to be an easy resolution of HR formally informing our Payroll Dept. that she is cleared. Our next payroll run would not be until the first of May and for Ms. Bradley's family to go without for that period of time should not be acceptable.

Thank you for any assistance you can provide and best regards,

Beverley

----- Forwarded message -----

From: **BEVERLEY SENIOR** <bsenior@jcboe.org>

Date: Mon, Apr 6, 2020 at 3:06 PM

Subject: URGENT

To: EDWIN RIVERA <erivera@jcboe.org>

Cc: RADIAH BRADLEY <rbradley2@jcboe.org>, John Dillon <DillonJ@njea.org>

Good afternoon Mr. Rivera,

I recently received confirmation from Denise Pawlowski stating to the best of her knowledge Radiah Bradley has returned to work. I am requesting you please send Ms. Cristina Kliatchko, Supervisor of Payroll the required notification from HR clearing Ms. Bradley to return to work as of March 24th per her leave documents so that her compensation will be included in tomorrow's payroll run to be issued on April 9, 2020.

Thank you in advance for your assistance and prompt attention to this matter. If there is anything that I can do to assist please let me know.

Be well, best regards and take care,

Beverley

--
Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

Exhibit “15”



RADIAH BRADLEY <rbradley2@jcboe.org>

URGENT RE: R. Bradley

2 messages

BEVERLEY SENIOR <bsenior@jcboe.org>

Thu, Apr 9, 2020 at 11:19 AM

To: FRANKLIN WALKER <fwalker@jcboe.org>

Cc: NORMA FERNANDEZ <nfernandez2@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>, REGINA ROBINSON <reginarobinson@jcboe.org>, EDWIN RIVERA <erivera@jcboe.org>

Good Morning Mr. Walker,

First and foremost, I hope this email finds everyone and their loved ones well.

I am reaching out to you on behalf of Ms. Radiah Bradley, a member of our CO clerical staff assigned to the Maintenance Department. Ms. Bradley returned from medical leave on 3/24/2020, resolved at our February 27, 2020 Board Meeting. Her leave was verified to have ended by our CO nurse assigned to HR. All relative documentation shared with me agrees and supports this.

Apparently, aside from Board resolutions, our Payroll Department requires notification from our HR Dept. that Ms. Bradley has returned from leave. We have made numerous attempts to resolve this foreseen issue since March 17, 2020. However most unfortunately, Ms. Bradley has not received her paycheck today. As all are aware, due to our Spring Recess our next scheduled pay date will be May 1, 2020. For Ms. Bradley and her family to unjustly have to manage without an income during that stretch of time is unconscionable.

It is our understanding that a supplemental check can be issued remotely to correct this situation and we ask that you approve for it to be done. If there is any support I may offer, please advise. Your response will be greatly appreciated.

Thank you for all that you continue to do in leadership and support of our district through this most trying time and thank you for your consideration and assistance in this grave matter.

Remain safe and best regards,

Beverley

FRANKLIN WALKER <fwalker@jcboe.org>

Thu, Apr 9, 2020 at 1:21 PM

To: BEVERLEY SENIOR <bsenior@jcboe.org>

Cc: NORMA FERNANDEZ <nfernandez2@jcboe.org>, RADIAH BRADLEY <rbradley2@jcboe.org>, REGINA ROBINSON <reginarobinson@jcboe.org>, EDWIN RIVERA <erivera@jcboe.org>

I will look into it asap, thanks for reaching out. Be safe.

On Thu, Apr 9, 2020 at 11:19 AM BEVERLEY SENIOR <bsenior@jcboe.org> wrote:

Good Morning Mr. Walker,

First and foremost, I hope this email finds everyone and their loved ones well.

I am reaching out to you on behalf of Ms. Radiah Bradley, a member of our CO clerical staff assigned to the Maintenance Department. Ms. Bradley returned from medical leave on 3/24/2020, resolved at our February 27, 2020 Board Meeting. Her leave was verified to have ended by our CO nurse assigned to HR. All relative documentation shared with me agrees and supports this.

Apparently, aside from Board resolutions, our Payroll Department requires notification from our HR Dept. that Ms. Bradley has returned from leave. We have made numerous attempts to resolve this foreseen issue since March 17, 2020. However most unfortunately, Ms. Bradley has not received her paycheck today. As all are aware, due to our Spring Recess our next scheduled pay date will be May 1, 2020. For Ms. Bradley and her family to unjustly have to manage without an income during that stretch of time is unconscionable.

It is our understanding that a supplemental check can be issued remotely to correct this situation and we ask that you approve for it to be done. If there is any support I may offer, please advise. Your response will be greatly appreciated.

Thank you for all that you continue to do in leadership and support of our district through this most trying time and thank you for your consideration and assistance in this grave matter.

Remain safe and best regards,

Beverley

Exhibit “16”

**RADIAH BRADLEY** <rbradley2@jcboe.org>

Radiah Bradley

3 messages

RADIAH BRADLEY <rbradley2@jcboe.org>
To: FRANKLIN WALKER <fwalker@jcboe.org>

Fri, Apr 10, 2020 at 11:16 AM

Good morning Mr. Walker,

Mr. Walker you said if I ever had a problem I could come to you. I'm reaching out to you because I have not been paid. I was relying on my check April 9th check to put groceries in my home. I'm home with my eight year old daughter and I don't have any food. I don't mean to be a bother but my child relies on me. I would like to know if you had a chance to look into me being paid. I would greatly appreciate it. I'm going to include my cell phone number(201)727-3233.

Be blessed and stay safe,

Radiah Bradley

Radiah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

Exhibit “17”

**RADIAH BRADLEY** <rbradley2@jcboe.org>

Pay

1 message

RADIAH BRADLEY <rbradley2@jcboe.org>

Mon, Apr 13, 2020 at 10:43 AM

To: EDWIN RIVERA <erivera@jcboe.org>

Cc: DENISE PAWLOWSKI <dpawlowski@jcboe.org>, FRANKLIN WALKER <fwalker@jcboe.org>, REGINA ROBINSON <reginarobinson@jcboe.org>

Good morning,

Since April 1, 2020, I have been reaching out to Human Resources regarding my pay. I have sent several emails pertaining to my pay. I was told someone would get back to me. As of today, no one has contacted me. Again I'm a single mom with a small child that depends solely on me. I have worked for The Jersey City Public School for seventeen years and 6 months. My doctor released to go back to work, with a return date of March 24, 2020. I sent an email and I was turned on in the system. I was even paid on March 31, 2020. Someone went back into the system and turned me off. I was told I could not come back from leave until we are a fully functioning district. I need to know how I will be paid? I have asked this question and received no response. My leave went through the February board meeting.

--

Radijah Bradley, Principal Clerk
Maintenance Department
346 Claremont Avenue
Jersey City, New Jersey 07305
(201)915-6352

Exhibit “18”



Radiah Jones <lrsjones123@gmail.com>

Radiah Bradley

7 messages

Radiah Jones <lrsjones123@gmail.com>

Tue, Apr 21, 2020 at 1:35 PM

To: "geraldlyons@jcboe.org" <geraldlyons@jcboe.org>

Good afternoon, I hope this email finds you all well. My name is Radiah Bradley and I have worked for The Jersey City Public Schools for 17 years and 6 month. I work in the maintenance department as a Clerk 3. The Jersey City Public Schools is my family. I'm a dedicated worker. Since August 2019 I had been having medical problems but because of me not wanting to take off from work and being afraid my work would get backed up I choose to work and my medical problems got worse. I had to have emergency surgery in January 2020. After I had emergency surgery I developed a slight complication so my doctor put me out of work until 3/24/2020 to ensure I was good and ready to work when I returned to work. On 3/24/2020 The Jersey City Public Schools were working remotely from home. I sent an email on 3/24/2020 to my director Tommy Curtis, the business Administrator Regina Robinson and the Administrative Clerk In my department Florence. I stated in the email that I was returning to work and I had signed into the portal. I asked the Administrative clerk if there was anything I should do and she said no. I then reached out to the administrative clerk and told her I needed to be turned back on through payroll, an email was sent to payroll and I was turned back on in the system. I received a partial check on 3/31/2020 for the days I had worked. On April 1, I was asked to come into work and process payroll for 9 workers. The email had been sent out the day before around 5pm. I didn't not see the email until the next day Because my day is over at 4:30 pm. The next morning when I had to log into the attendance portal, I believe this was April 1, 2020. I replied to the email that I could not come in because I had my 8 year old daughter home with me. I'm a single parent and I had no one to watch her. Since the pandemic nobody wants to open there doors to babysit and I can't blame anyone. I (cc) Mr. Walker in the email so that he would be aware. I also sent a copy of the notice that my daughters school sent home to the parents. I received an email back from Mrs. Robinson and she wanted to know why I had (cc) Mr. Walker in a departmental matter. She told me she was taking Mr. Walker off the email for obvious reasons. I emailed her back, letting her know I emailed him so he could be aware of why I couldn't come in due to the child care issue. I told Mrs. Robinson I was told to email her and Mr. Walker. I did tell everyone is the email that I could do the payroll from my house because the payroll is done online. I was told by Regina Robinson to reach out to Mr. Edwin Rivera to be cleared to come back to work. I found this request odd because I was cleared to come back to work on the February 27, 2020 board meeting. I also receive an email from Human Resources letting me know my leave would go through the February board meeting and I had to report to work on 3/24/2020. I emailed Mr. Rivera as Mrs. Robinson instructed me to. Please keep in mind this is I believe April 1, 2020. I had been back from leave on 3/24/2020. I had been signing into the attendance portal and I even received a pay check from payroll. I reached out to Mr. Rivera and I told him Mrs. Robinson told me I needed to be cleared to come back. Mr. Rivera emailed me back and told me, I had to stay on a leave until the district went back to a full functioning district. The next day I tried to sign into the attendance portal and I could not, I had been shut off. I then emailed Mr. Rivera back and I told him I was confused because I was already cleared to come back and I had turned In all of my paperwork. I also told him I needed to be paid because my doctor had released me to return back to work which means my insurance company is not going to pay me. Mr. River never responded back to me. I have sent him messages since then asking for clarification and I have not received a response. I reached out to Mrs. Robinson for clarification, she emailed me back and said Mr. Rivera would reach out to me. I did not hear anything from Mr. Rivera so I reached out to Mrs. Robinson and I did not receive a response. I reached out to Mrs Robison and Mr Walker. I explained to them that I had a small child at home that depends solely on me because I'm a single mom. I told them I didn't get paid and I did not have any food in my house because I was relying on my pay check to pay some bills and feed my child. Mr. Walker said he would look into it and I have not heard anything. I reached out to everyone and I'm reaching out to the board with a heavy heart. I feel so discouraged because I feel like a job that I love my family has left me out in the cold. No one will answer my emails. My landlord is calling for the rent and I can't pay it. I have been a faithful worker for over 17 years. I didn't want to reach out to anyone if I didn't have my daughter to feed I might not have said

anything but I don't know what to do. Before I left for the surgery , I had no problems all of my work was done like it always is. This breaks my heart. I have been a faithful employee and I asking that you please try and help me. I'm a good person with a good heart. I love my job. I don't know what to do.

GERALD LYONS <geraldlyons@jcboe.org>
To: Radiah Jones <lrsjones123@gmail.com>

Wed, Apr 22, 2020 at 5:47 AM

I'll let you know what I hear from the district. Thanks.

[Quoted text hidden]

--

Gerald M. Lyons, Board Member
Jersey City Board of Education
346 Claremont Avenue
Jersey City, New Jersey 07305
geraldlyons@jcboe.org
cell - 201-334-7999

Radiah Jones <lrsjones123@gmail.com>
To: GERALD LYONS <geraldlyons@jcboe.org>

Wed, Apr 22, 2020 at 7:24 AM

Thank you,

I appreciate you reaching out to the district on my behalf.

[Quoted text hidden]

GERALD LYONS <geraldlyons@jcboe.org>
To: Radiah Jones <lrsjones123@gmail.com>

Mon, Apr 27, 2020 at 1:02 PM

Have you heard anything from the district?
Thanks.

[Quoted text hidden]

Radiah Jones <lrsjones123@gmail.com>
To: GERALD LYONS <geraldlyons@jcboe.org>

Mon, Apr 27, 2020 at 1:05 PM

No sir ,

I have not heard anything from them.

[Quoted text hidden]

GERALD LYONS <geraldlyons@jcboe.org>
To: Radiah Jones <lrsjones123@gmail.com>

Thu, Apr 30, 2020 at 2:15 PM

Good afternoon, Ms. Jones.

I reached out to the district again regarding your case and was told that they are familiar with it and that it is being discussed by the district. Unfortunately, as a Board Member, I can bring cases like yours to their attention and ask for additional information.

I hope things are going well for you. Stay safe.

Gerald Lyons

On Tue, Apr 21, 2020 at 1:38 PM Radiah Jones <lrsjones123@gmail.com> wrote:

Good afternoon, I hope this email finds you all well. My name is Radiah Bradley and I have worked for The Jersey City Public Schools for 17 years and 6 month. I work in the maintenance department as a Clerk 3. The Jersey City Public Schools is my family. I'm a dedicated worker. Since August 2019 I had

been having medical problems but because of me not wanting to take off from work and being afraid my work would get backed up I choose to work and my medical problems got worse. I had to have emergency surgery in January 2020. After I had emergency surgery I developed a slight complication so my doctor put me out of work until 3/24/2020 to ensure I was good and ready to work when I returned to work. On 3/24/2020 The Jersey City Public Schools were working remotely from home. I sent an email on 3/24/2020 to my director Tommy Curtis, the business Administrator Regina Robinson and the Administrative Clerk In my department Florence. I stated in the email that I was returning to work and I had signed into the portal. I asked the Administrative clerk if there was anything I should do and she said no. I then reached out to the administrative clerk and told her I needed to be turned back on through payroll, an email was sent to payroll and I was turned back on in the system. I received a partial check on 3/31/2020 for the days I had worked. On April 1, I was asked to come into work and process payroll for 9 workers. The email had been sent out the day before around 5pm. I didn't see the email until the next day Because my day is over at 4:30 pm. The next morning when I had to log into the attendance portal, I believe this was April 1, 2020. I replied to the email that I could not come in because I had my 8 year old daughter home with me. I'm a single parent and I had no one to watch her. Since the pandemic nobody wants to open there doors to babysit and I can't blame anyone. I (cc) Mr. Walker in the email so that he would be aware. I also sent a copy of the notice that my daughters school sent home to the parents. I received an email back from Mrs. Robinson and she wanted to know why I had (cc) Mr. Walker in a departmental matter. She told me she was taking Mr. Walker off the email for obvious reasons. I emailed her back, letting her know I emailed him so he could be aware of why I couldn't come in due to the child care issue. I told Mrs. Robinson I was told to email her and Mr. Walker. I did tell everyone is the email that I could do the payroll from my house because the payroll is done online. I was told by Regina Robinson to reach out to Mr. Edwin Rivera to be cleared to come back to work. I found this request odd because I was cleared to come back to work on the February 27, 2020 board meeting. I also receive an email from Human Resources letting me know my leave would go through the February board meeting and I had to report to work on 3/24/2020. I emailed Mr. Rivera as Mrs. Robinson instructed me to. Please keep in mind this is I believe April 1, 2020. I had been back from leave on 3/24/2020. I had been signing into the attendance portal and I even received a pay check from payroll. I reached out to Mr. Rivera and I told him Mrs. Robinson told me I needed to be cleared to come back. Mr. Rivera emailed me back and told me, I had to stay on a leave until the district went back to a full functioning district. The next day I tried to sign into the attendance portal and I could not, I had been shut off. I then emailed Mr. Rivera back and I told him I was confused because I was already cleared to come back and I had turned in all of my paperwork. I also told him I needed to be paid because my doctor had released me to return back to work which means my insurance company is not going to pay me. Mr. River never responded back to me. I have sent him messages since then asking for clarification and I have not received a response. I reached out to Mrs. Robinson for clarification, she emailed me back and said Mr. Rivera would reach out to me. I did not hear anything from Mr. Rivera so I reached out to Mrs. Robinson and I did not receive a response. I reached out to Mrs Robison and Mr Walker. I explained to them that I had a small child at home that depends solely on me because I'm a single mom. I told them I didn't get paid and I did not have any food in my house because I was relying on my pay check to pay some bills and feed my child. Mr. Walker said he would look into it and I have not heard anything. I reached out to everyone and I'm reaching out to the board with a heavy heart. I feel so discouraged because I feel like a job that I love my family has left me out in the cold. No one will answer my emails. My landlord is calling for the rent and I can't pay it. I have been a faithful worker for over 17 years. I didn't want to reach out to anyone if I didn't have my daughter to feed I might not have said anything but I don't know what to do. Before I left for the surgery, I had no problems all of my work was done like it always is. This breaks my heart. I have been a faithful employee and I asking that you please try and help me. I'm a good person with a good heart. I love my job. I don't know what to do.

[Quoted text hidden]

Radiah Jones <lrsjones123@gmail.com>
 To: GERALD LYONS <geraldlyons@jcboe.org>

Thu, Apr 30, 2020 at 2:16 PM

Thanks for your help.

[Quoted text hidden]

Exhibit “19”



RADIAH BRADLEY <rbradley2@jcboe.org>

Please call me

4 messages

DENISE PAWLOWSKI <dpawlowski@jcboe.org>
 To: RADIAH BRADLEY <rbradley2@jcboe.org>

Thu, Apr 30, 2020 at 12:43 PM

Good Afternoon Ms. Bradley,

Hope all is well with you and your family. Please give me a call at your earliest convenience. You can reach me at 201-706-0985.
 Denise

--
 Denise Pawlowski, RN
 Central Office Nurse
 Jersey City Public Schools
 201-369-3765

RADIAH BRADLEY <rbradley2@jcboe.org>
 To: DENISE PAWLOWSKI <dpawlowski@jcboe.org>

This is my paperwork if you need anything my cell phone number is 2017273233

2:51



X 2020_04_27_13_21_03.pdf



DISABILITY CERTIFICATE
ADVANCED LAPAROSCOPIC ASSOCIATES
 General and Laparoscopic Surgery
 81 E. State Route 4, Suite 401
 Paramus, New Jersey 07652
 Telephone: (201) 648-1121
 Fax: (201) 648-1110

Date 4/27/2020

This is to certify that RADIAH BRADLEY

has been under my professional care and was:

☒ Totally Incapacitated ☐ Partially Incapacitated

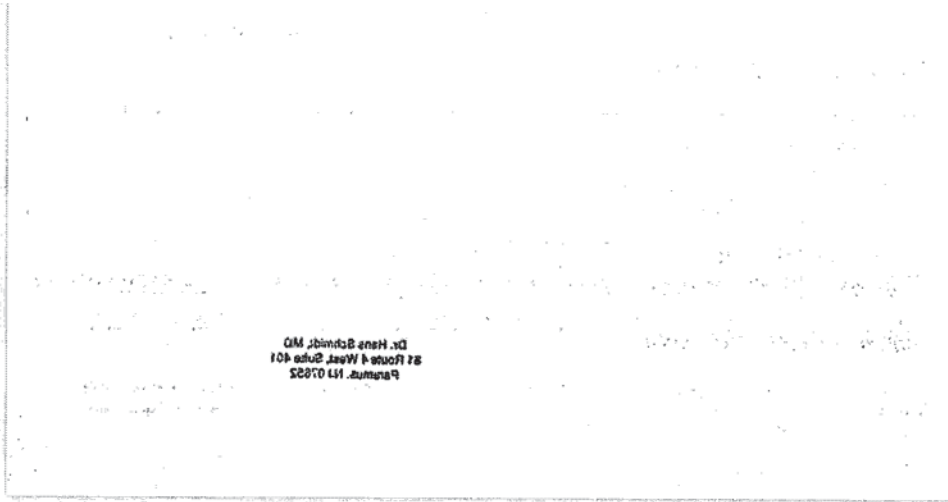
from 1-13-2020 to _____

Remarks: **THIS PATIENT UNDERWENT A PROCEDURE ON 1-13-2020 AND WAS CLEARED TO RETURN TO WORK ON 3/23/2020. WE FEEL THAT THE PATIENT HAS SUFFICIENTLY RECOVERED AND WAS ABLE TO RESUME WORK (FULL DUTY) WITH NO RESTRICTIONS.**

Dr. Hans Schmidt, MD
 81 Route 4 West, Suite 401
 Paramus, NJ 07652

When sending directly to the employer, federal HIPAA regulations require an authorization signed by the patient. See Form 614336/24536 to the Patient's Employer: Authorization for the Use or Disclosure of Health Information.

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2:50 ↗



RTW STATUS



Inbox



Surgical Supervisor Apr 27



to me ▾

Hello Radiah

As per your disability status, you were cleared to return to work as of 3/23/2020. Please inform your employer that we feel you have sufficiently recovered from your procedure on 1/13/2020 and there is no medical reason to extend your leave. I will attach an updated Disability Certificate with this information.

--

Thank you,

Michele Spencer
Surgical Supervisor

Comments: _____
_____ I hereby certify I have reviewed
_____ I hereby certify I have reviewed

Date: 11/13/2020 11/13/2020

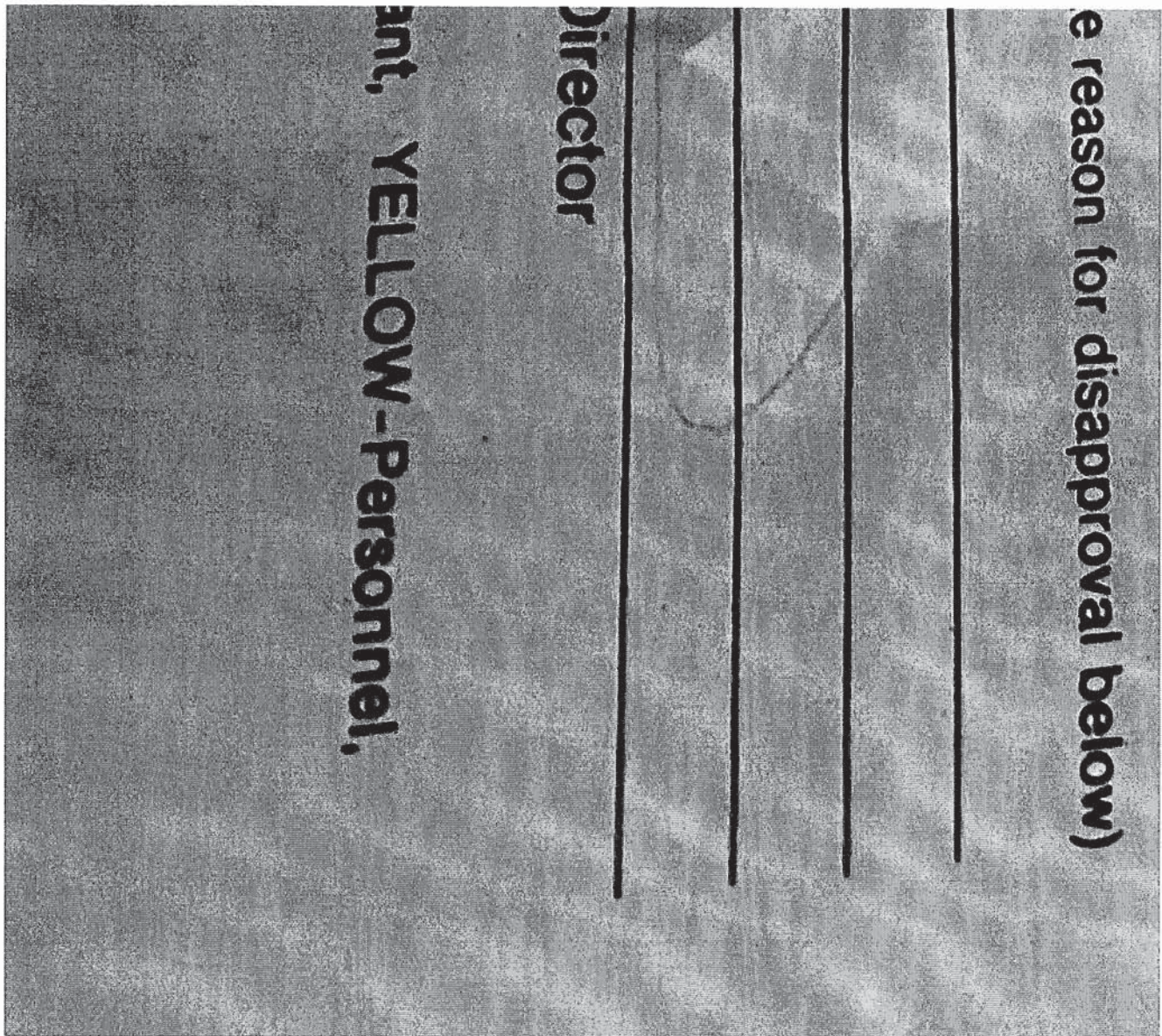
Distribution of copies: **WHITE-Associate**
PINK-Payroll, G

Reviewed and **APPROVE** this application
Reviewed and **DO NOT APPROVE** this application. (Indicate)

Superintendent's Office, BLUE-School, GREEN-Applicant
OLD-Medical Department

Medical Department

APPLICANT COPY



[Quoted text hidden]

--
 Radiah Bradley, Principal Clerk
 Maintenance Department
 346 Claremont Avenue
 Jersey City, New Jersey 07305
 (201)915-6352

DENISE PAWLOWSKI <dpawlowski@jcboe.org>
 To: RADIAH BRADLEY <rbradley2@jcboe.org>

Thu, Apr 30, 2020 at 3:25 PM

Thank you Radiah.
 Stay well.
 Denise

[Quoted text hidden]

RADIAH BRADLEY <rbradley2@jcboe.org>
 To: DENISE PAWLOWSKI <dpawlowski@jcboe.org>

Thu, Apr 30, 2020 at 4:15 PM

4:14



LOA for Radiah Bradley #02-0310



Inbox



TRACEY STONE Feb 12



to me, THOMAS, REGINA, DENISE, Ed... ▾

Good Afternoon:

The Medical department received on February 12th LOA for Radiah Bradley, Clerk 3, from 02/11/20 to 03/23/20 tentatively. The return to work is March 24, 2020. Please notify the Medical Department in HR if the employee does not report back to work..

This leave will be presented at the next Board of Education meeting for their review and subsequent approval.

...

*Tracey Stone
Personnel Assistant
Medical Department
(201) 915-6362 (Office)
(201) 915-0253 (Fax)*

[Quoted text hidden]

Exhibit “20”

----- Forwarded message -----

From: **RADIAH BRADLEY** <rbradley2@jcboe.org>

Date: Thu, May 21, 2020 at 5:32 PM

Subject: Re: Onsite Schedule

To: NORMA FERNANDEZ <nfernandez2@jcboe.org>

CC: THOMAS CURTIS <tcurtis@jcboe.org>, REGINA ROBINSON <reginarobinson@jcboe.org>, EDWIN RIVERA <erivera@jcboe.org>, CHRISTY OLIVER-HAWLEY <coliver1@jcboe.org>

Dear Ms. Fernandez,

That was never communicated to me. My doctor cleared me to return to work and I did return to work. I was then told to go out on a medical leave. There was no reason given for this directive. When I tried to contact the relevant people to understand this, I was taken off payroll and denied access to the portal. I took this as a termination.

Please provide the written school policy that supports your statement that I must go to Concentra to obtain medical clearance from the Concentra doctor.

I would further note that I did return to work from my leave. So I was not on a long term leave when my pay was stopped, and I was terminated. When I first interacted with the Board, no one said anything about Concentra and Concentra never contacted me.

Now that I have advised you of my legal claims, you are sending me this email.

Radiah Bradley

On Thu, May 21, 2020 at 1:21 PM NORMA FERNANDEZ <nfernandez2@jcboe.org> wrote:

Dear Ms. Bradley,

Thank you for your e-mail. Please note that your employment with JCPS was never terminated. The District communicated to you previously that since you are returning from a long-term leave of absence, you would first need to obtain medical clearance from the Concentra doctor. The District contacted Concentra about your return to work, and the Concentra doctor responded that you would need to set up an appointment with them to be evaluated. If you have further questions on setting up your appointment with Concentra, please contact Nurse Denise Pawlowski.

Also, since you stated you "complained of...disability discrimination and retaliation", your matter will be referred to the Affirmative Action Officer, Dr. Oliver-Hawley.

Sincerely,
Dr. Norma Fernandez
Deputy Superintendent

On Tue, May 19, 2020 at 10:51 AM RADIAH BRADLEY <rbradley2@jcboe.org> wrote:

Dear Florence,
As you know, I was retaliated after I returned to work from a FMLA/disability leave. I have made several complaints about that. My pay was shut off. I was not allowed to come back to work. Further, I was kicked off the attendance portal. I was told to contact Mr. Rivera of HR and did so. However, with all due respect, I found him to be non-responsive and not helpful. I was told that I had to remain on a medical leave, despite the fact that my doctor cleared me to return to work and the board passed its resolution. I complained of this disability discrimination and retaliation and was still not allowed to return to work. This is why I filed for unemployment benefits. Thus, I am assuming Dr. Fernandez' directive does not apply to me as I have been illegally terminated by the Jersey City Board of Education. I have retained Hyderally & Associates, P.C. to represent me going forward. However, you can certainly feel free to respond to me about my response to the email I got yesterday.

Sincerely,

Radijah Bradley

Radijah Bradley, Principal Clerk
Maintenance Department
[346 Claremont Avenue](#)
[Jersey City, New Jersey 07305](#)
[\(201\)915-6352](#)

On Mon, May 18, 2020 at 1:00 PM FLORENCE BRAJCZEWSKI <fbrajczewski@jcboe.org> wrote:

Good Afternoon,

Per the directive sent by Dr. Fernandez, which is listed below, Administrators and clerical staff are required to work one day per week. The Business Administrator has requested the schedule for the clerical staff in the Facilities/Maintenance Department. This information is requested by the close of business tomorrow, May19, 2020. Please let me know the day you are available. I will be working on Fridays.

Thank you,
Florence

Good afternoon,

After listening to some of your concerns Mr. Walker would like to make the following changes or adjustments to the plan for working on-site one day per week.

- Please notify your administrators and clerks at Central Office that they will need to work one day per week.

- Administrators may be scheduled from Monday to Friday to offer space for distancing.
- Clerks at Central Office, should be scheduled as needed one day on a day an administrator is present to facilitate the tasks in that department. On the offsite days, all employees will continue to work remotely.
- Upon entering CO, employees will be screened by the nurse working that day.
- School-based employees will be screened at the meal distribution sites. If a particular school does not distribute meals, they will need to visit the nearest site before reporting to their schools. (Mr. Walker will be sending the principals a letter with this information)

Currently, all the essential employees on site are screened before reporting to their assignment. I will be creating a Google Document for you to record your department's schedule for the week. This way the information could be reviewed easily as needed.

Hopefully, this flexibility would allow for social distancing, and employees on site are expected to bring and wear the mask they use to be in compliance with the Executive Order. If there is a particular case that needs adjustment, please do not hesitate to let Mr. Walker know.

Thank you for your continued diligence and support.

--

Norma Fernandez, Ed.D.
Deputy Superintendent
[Jersey City Public Schools](#)
[346 Claremont Avenue](#)
[Jersey City, NJ 07305](#)
201 915-6210 Office
201 565-6733 Mobile

--

Florence Brajczewski
Management Assistant/Facilities Department
[Jersey City Public Schools](#)
[346 Claremont Avenue - Room 710](#)
[Jersey City, NJ 07305](#)
201.915.6379 * Fax 201.433.9447
fbrajczewski@jcboe.org

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You received this message because you are subscribed to the Google Groups "CLERICAL" group.
To unsubscribe from this group and stop receiving emails from it, send an email to clerical+unsubscribe@jcboe.org.
To view this discussion on the web visit https://groups.google.com/a/jcboe.org/d/msgid/clerical/CANeDPKtKR-N3b48AbcFk-Rjz0_r7cA-24KjD7F8LFwyy%3Dgbm3Q%40mail.gmail.com.

--
Norma Fernandez, Ed.D.
Deputy Superintendent
[Jersey City Public Schools](#)
[346 Claremont Avenue](#)
[Jersey City, NJ 07305](#)
201 915-6210 Office

201 565-6733 Mobile

--

Radiah Bradley, Principal Clerk
Maintenance Department
[346 Claremont Avenue](#)
[Jersey City, New Jersey 07305](#)
(201)915-6352

Civil Case Information Statement

Case Details: HUDSON | Civil Part Docket# L-002632-20

Case Caption: BRADLEY RADIAH VS JERSEY CITY
PUBLIC S CHOOLS

Case Initiation Date: 07/21/2020

Attorney Name: TY HYDERALLY

Firm Name: HYDERALLY & ASSOCIATES, P.C.

Address: 33 PLYMOUTH ST STE 202
MONTCLAIR NJ 07042

Phone: 9735098500

Name of Party: PLAINTIFF : Bradley, Radiah

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: Radiah Bradley? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

07/21/2020
Dated

/s/ TY HYDERALLY
Signed

RADIAH BRADLEY

Plaintiff

VS

JERSEY CITY PUBLIC SCHOOLS, ET AL

Defendant



20200804160422

Superior Court Of New Jersey

HUDSON Venue

Docket Number HUD L 2632 20

Person to be served (Name and Address)

JERSEY CITY PUBLIC SCHOOLS

346 CLAREMONT AVENUE

JERSEY CITY NJ 07305

By serving JERSEY CITY PUBLIC SCHOOLS

Attorney TY HYDERALLY, ESQ

Papers Served SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT
NOTICE, DEMANDS, CERTIFICATION, EXHIBITS

Service Data ☒ Served Successfully ☐ Not Served

Date/Time 8/5/2020 8 51 AM

☐ Delivered a copy to him/her personally

☐ Left a copy with a competent household member over 14 years of age
residing therein (indicate name & relationship at right)

☒ Left a copy with a person authorized to accept service, e.g. managing agent,
registered agent, etc. (indicate name & official title at right)

AFFIDAVIT OF SERVICE

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ _____

Name of Person Served and relationship/title

TIANA ALICIA

PERSON AUTHORIZED TO ACCEPT SERVICE

Description of Person Accepting Service

SEX F AGE 51-65 HEIGHT 5'4"-5'8" WEIGHT 161-200 LBS SKIN BLACK HAIR BLACK OTHER _____

Unserved

- ☐ Defendant is unknown at the address furnished by the attorney
☐ All reasonable inquiries suggest defendant moved to an undetermined address
☐ No such street in municipality
☐ Defendant is evading service
☐ Appears vacant
☐ No response on

Date/Time _____
Date/Time _____
Date/Time _____

Other _____

Served Data

Subscribed and Sworn to me this

6 day of Aug, 2020

Notary Signature _____

KIMBERLY GROTE

NOTARY PUBLIC OF NEW JERSEY

Name of Notary _____

Commission Expires Dec 18, 2020

I, MICHAEL MARRA,

was at the time of service a competent adult, over the age
of 18 and not having direct interest in the litigation. I declare
under penalty of perjury that the foregoing is true and
correct.

Signature of Process Server _____

86 / 2020
Date

Name of Private Server MICHAEL MARRA Address 2009 Morris Avenue UNION, NJ 07083 Phone (800) 672-1952

HUDSON COUNTY SUPERIOR COURT
HUDSON COUNTY
583 NEWARK AVENUE
JERSEY CITY NJ 07306

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 748-4400
COURT HOURS 8:30 AM - 4:30 PM

DATE: JULY 21, 2020
RE: BRADLEY RADIAH VS JERSEY CITY PUBLIC S CHOOOLS
DOCKET: HUD L -002632 20

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON JOSEPH V. ISABELLA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (201) 748-4400.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: TY HYDERALLY
HYDERALLY & ASSOCIATES, P.C.
33 PLYMOUTH ST
STE 202
MONTCLAIR NJ 07042

ECOURTS